

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re: :  
: Docket #20cv8924  
IN RE NEW YORK CITY POLICING :  
DURING SUMMER 2020 DEMONSTRATIONS :  
: New York, New York  
: July 21, 2022  
----- : TELEPHONE CONFERENCE

PROCEEDINGS BEFORE  
THE HONORABLE GABRIEL W. GORENSTEIN,  
UNITED STATES MAGISTRATE JUDGE

APPEARANCES:

For Sow and Hernandez      COHEN & GREEN PLLC  
Plaintiffs:                    BY: REMY GREEN, ESQ.  
                                 1639 Centre Street, Suite 216  
                                 Ridgewood, New Jersey 11207

For Payne Plaintiffs:      NEW YORK CIVIL LIBERTIES UNION  
                                 BY: VERONICA SALAMA, ESQ.  
                                 125 Broad Street, 19<sup>th</sup> Floor  
                                 New York, New York 10004

For Sierra Plaintiffs:      RICKNER PLLC  
                                 BY: ROB RICKNER, ESQ.  
                                 14 Wall Street, Suite 1603  
                                 New York, New York 10005

For Gray Plaintiffs:      WYLIE STECKLOW PLLC  
                                 BY: WYLIE STECKLOW, ESQ.  
                                 111 John Street, Suite 1050  
                                 New York, New York 10038

For Plaintiff People      NEW YORK STATE OFFICE OF  
of the State of New      THE ATTORNEY GENERAL  
York:                        BY: LILLIAN MARQUEZ, ESQ.  
                                 28 Liberty Street  
                                 New York, New York 10005

Transcription Service: Carole Ludwig, *Transcription Services*  
                                 155 East Fourth Street #3C  
                                 New York, New York 10009  
                                 Phone: (212) 420-0771  
                                 Email: Transcription420@aol.com

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APPEARANCES (CONTINUED):

For Wood Plaintiffs: KAUFMAN LIEB LEBOWITZ & FRICK, LLP  
BY: ALISON FRICK, ESQ.  
18 E. 48<sup>th</sup> Street, Suite 802  
New York, New York 10017

For Roland Plaintiffs: THE ABOUSHI LAW FIRM  
BY: AYMEN ABOUSHI, ESQ.  
1441 Broadway, Suite 5036  
New York, New York 10018

For Defendants: NEW YORK CITY LAW DEPARTMENT  
BY: AMY ROBINSON, ESQ.  
GENEVIEVE NELSON, ESQ.  
JENNY WENG, ESQ.  
BRIDGET HAMILL, ESQ.  
100 Church Street  
New York, New York 10007

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None					

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<u>Exhibit Number</u>	<u>Description</u>	<u>ID</u>	<u>In</u>	<u>Voir Dire</u>
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THE CLERK: We're here in In Re: New York City Policing During Summer 2020 Demonstrations, case number 20cv8924.

Will counsel please state their appearances for the record starting with plaintiffs.

MS. LILLIAN MARQUEZ: (indiscernible)

HONORABLE GABRIEL W. GORENSTEIN (THE COURT): Stop, whoever just spoke is completely unintelligible. Do any of the other attorneys know who that was?

(cross-talk)

THE COURT: I couldn't hear the answer to that question.

COUNSEL FOR PLAINTIFFS: I'm sorry, Your Honor, that was Lillian Marquez for the Attorney General's Office.

THE COURT: Well, Ms. Marquez, you're going to need to call back in I guess because it was unintelligible. Why don't we continue with other plaintiffs and hope that Ms. Marquez gets back. Go ahead.

MR. WYLIE STECKLOW: Good morning, Your Honor, Wylie Stecklow for the plaintiffs in the Gray matter.

MX. REMY GREEN: Good morning, Your Honor, Remy Green for the plaintiffs in the Hernandez and Sow cases.

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2 For the record, I should appear in the transcript as Mx.  
3 Green spelled M-X-period rather than Mr. or Ms. And I  
4 should just alert the Court that last night I think a  
5 little bit before midnight, maybe a bit earlier but before  
6 defendants' letter, the Hernandez plaintiffs accepted a Rule  
7 68 offer. So my capacity in that sense is mooted.

8 MS. VERONICA SALAMA: Good morning, Your  
9 Honor, this is Veronica Salama from the New York Civil  
10 Liberties Union Foundation on behalf of the Payne  
11 plaintiffs.

12 MR. AYMEN ABOUSHI: Good morning, Your Honor,  
13 Aymen Aboushi of the Aboushi Law Firm on behalf of the  
14 Roland plaintiffs.

15 MR. ROBERT RICKNER: Hello, Your Honor, Rob  
16 Rickner on behalf of the Sierra plaintiffs. Good morning.

17 MS. ALISON FRICK: Good morning, Your Honor,  
18 this is Alison Frick on behalf of the Wood plaintiffs.

19 THE COURT: Ms. Marquez, were you able to join  
20 us? Any other plaintiffs' lawyers left? Okay, why don't  
21 we hear defendants' appearances, I'm going to mute.

22 MS. AMY ROBINSON: Good morning, Your Honor,  
23 this is Amy Robinson for defendants.

24 MS. BRIDGET HAMILL: Good morning, Your Honor,  
25 this is Bridget Hamill for the defendants.

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MS. GENEVIEVE NELSON: Good morning, Your Honor,  
Genevieve Nelson for defendants.

MS. JENNY WENG: Good morning, Your Honor,  
Jenny Weng for the defendants.

THE COURT: All right, and the interveners?  
Sounds like they are not present. Okay, I assume it's  
Ms. Frick who is speaking for the plaintiffs?

MS. FRICK: Yes, Your Honor.

THE COURT: Okay, so I am not going to wait for  
Ms. Marquez. All right, this is a conference that's being  
recorded, it's open to the public, however, any further  
recording or dissemination of the proceeding is prohibited.  
Also, the attorneys should remain on mute unless they're  
actually addressing the Court.

We're here based on a letter, 667, from the  
plaintiffs and the responsive letter, 678. Who is speaking  
for the defendants, Ms. Hamill, is that you?

MS. ROBINSON: Your Honor, this is Amy Robinson  
for defendants, we would like to, defendants would like to  
seek leave to have two attorneys from defendants speak at  
this conference, there are two of us that are particularly  
involved in the deposition topic.

THE COURT: Okay, as long as you don't give me  
different answers to a question.

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MS. ROBINSON: Understood, Your Honor.

THE COURT: All right, so I'm, you know, we all have the same goal, I believe, I think the City has expressed its interest in achieving the same goal that the plaintiffs are which is obviously to comply with the Court's order. I guess, before we get to the nitty gritty here, I understand from the letter there are 122 deposition days, I think I got that from plaintiffs' letter, so let me ask Ms. Frick, does that number include plaintiff depositions as well as defendant depositions?

MS. FRICK: No, Your Honor.

THE COURT: So how many -- so in addition to that there are plaintiff depositions?

MS. FRICK: Yes, Your Honor, although with the (inaudible) for the Hernandez plaintiffs, the actual number of plaintiffs left to be deposed I believe is relatively small, I believe it's only the Roland plaintiffs and I'm not sure how many people that is, oh, and four Gray plaintiffs, as well, so I think we're, we're looking at, you know, a handful here.

THE COURT: Well the numbers actually matter to me so it's (inaudible) for Roland, you said?

MS. FRICK: Yes, there are four Gray and then

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there are Roland plaintiffs and I don't know offhand the number of Roland plaintiffs that there are. But I'm sure somebody can tell me that.

THE COURT: Can anyone answer that question?

MR. ABOUSHI: Yes, Your Honor, Aymen Aboushi for the Roland plaintiffs, there are six.

THE COURT: So six Roland and the others were, I'm sorry, Gray?

MS. FRICK: Yes, Your Honor.

THE COURT: So it's a total of ten left?

MS. FRICK: Yes.

THE COURT: Okay. So talking under 32 deposition days unless plaintiffs drop out, okay. And as I recall, some depositions, is the 122, is that taking into account half days or are those being (inaudible) in that 122?

MS. FRICK: I believe that the 122 accounts for half days though there may be additional officers that could be done in half days that are right now marked on the chart as a full day. But as I understand it, our internal chart that counts as half days is what adds up to that number.

THE COURT: Okay. So the 10 depositions that the City, and I guess I'm turning to whoever is



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2 answering this question from the City, the way I  
3 understood the City's letter is that there are going  
4 to be a total, they're ready to do 10 depositions  
5 between now and September and only 10. I didn't know  
6 if that meant 10 defendants' depositions or if plaintiffs  
7 were to be involved that could be added or what, I assume it  
8 was just 10 defendants and you could add the 10 plaintiffs  
9 if necessary. Is that correct, that's a question for the  
10 City?

11 MS. ROBINSON: Yes, Your Honor, this is Amy  
12 Robinson, we are prepared to provide plaintiffs with a  
13 list of 10 deponents including plaintiffs on Tuesday  
14 but we expect that there will be more deponents in  
15 August including high ranking deponents.

16 THE COURT: I didn't follow that. When you --  
17 when you, I read your letter to say we're ready to do  
18 10 in August, maybe just tell me what you meant by  
19 that?

20 MS. ROBINSON: The 10 in August would be, what  
21 we meant by that would be a mixture of both plaintiff  
22 and defendants. But that is, that's a minimum, we may be  
23 able to add more deponents in August including high ranking  
24 officers. There's just a bit of lead time necessary with  
25 respect to that category.

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1 THE COURT: Okay. I'm, I'm thinking about this in  
2 terms of time and numbers so I have in front of me  
3 essentially seven full months, if we're giving up on next  
4 week and, you know, if there's a way not to give up on next  
5 week that would certainly be helpful. And it seems  
6 plaintiff, plaintiffs (inaudible) not give up on next week.  
7 I mean unless there is a realistic potential for moving it  
8 out through a Rule 68 offer.  
9

10 So putting aside next week, we have 7 months and  
11 132 depositions if we include the plaintiffs, the 10  
12 plaintiffs. To do that we need to have 20 a month except  
13 for December which is shortened by holidays and February  
14 shortened by holidays, 15 for those months. If we do that,  
15 that will total 130 depositions, so that's 20 in August, 20  
16 in September, 20 in October, 20 in November, 15 in December,  
17 20 in January and 15 in February. And I guess since it's 132  
18 I really should say 17 in February. So let me just check my  
19 math one more time, yes, that's 132.

20 So I think I just need, I think I'm now ordering,  
21 so the City has to come up with deponents to fill that out  
22 and I will let them, because the plaintiffs, you know, the  
23 City I understand is under special obligation to produce  
24 information with respect to certain deponents so I'm willing  
25 to give the City the option to fill out months by, you know,

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identifying plaintiffs and saying to the plaintiffs, you know, on certain days you're going to have to produce, you know, 4 plaintiffs or 5 plaintiffs, maybe in August all 10 plaintiffs, I have no idea. That's the schedule that I'm now ordering. So 20 in August, 20 in September, 20 in October, 20 in November, 15 in December, 20 in January, 17 February. If the parties want to mutually agree to adjust those numbers and put a number in one place to another month or to say you know what, turns out we're not going to need that number of depositions, therefore, we can do 18 in September instead of 20, that's fine, as long as the parties mutually agree they can adjust the numbers.

So having said that, I'm willing to hear from both parties to say if there is some problem with doing that, anything from the plaintiffs' side? Ms. Frick, I assume you're consulting, I'm happy to give you a few minutes if that's what you want?

MS. FRICK: Oh, I'm so sorry, I was just talking on mute, I apologize.

THE COURT: Okay.

MS. FRICK: I apologize, Your Honor, I just had two things, two thoughts. The first is that it may make sense to order the scheduling of slightly more than 20, something like 22 or 23 to account for, you

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know, the inevitable illness or urgent situation that comes up for the witness or for defense counsel or something like that.

And the other point is I have some concern for the indication in their letter that they want to frontload and only schedule low level depositions first and kind of get through all of those before moving on to the high level. And my concern about that is just that it's very likely that we'd be able to cut some low level officers as time goes on and as we learn more, particularly from higher level deponents. And so in the sense of efficiency it would make much more sense to have at least a mixture. And that's what we had presented in our batch was a mixture of high level and low level including somebody like Gerard Dowling who, you know, has already been prepped, already had a day of deposition and would just need to come and finish his deposition per the Court's order from earlier this spring.

So if there is some capacity to urge (inaudible) to include high level deponents mixed in with lower level, it's something that plaintiffs would, would surely appreciate.

THE COURT: All right, does the City want to

1  
2 respond?

3 MS. ROBINSON: Yes, we are absolutely willing  
4 to do that, the only reason that we have not scheduled  
5 the high ranking as of yet is because we've been  
6 working diligently since the previous conference with  
7 the NYPD to work out the nuts and bolts of the  
8 protocol which is extremely complicated and requires  
9 a lot of moving parts to work together all at the same  
10 time. So that's the only reason we don't want to  
11 schedule a deposition unless we know how the protocol  
12 is going to work out. and I think that we have it down  
13 now how it's going to work out, we just have to see in  
14 practice how it works out.

15 For example, you know, we have to remove  
16 people's phones, all of their phones, for the text  
17 messages. They have to be taken to One PP, they have  
18 to, their ITB unit has to extract the information,  
19 have to come back to our e-discovery group and then  
20 come the case team, so that's just one example of how  
21 the high ranking deposition protocol is complicated.

22 THE COURT: How many of the, of the 132 how  
23 many are high ranking?

24 MS. ROBINSON: I think approximately 55,  
25 around that number.

THE COURT: Okay. Well it sounds like the plaintiffs believe the City should be incentivized to frontload to the extent they can high level depositions because it may eliminate other depositions, is that something the City recognizes?

MS. ROBINSON: Definitely, we understand that. And it's, we just want to make sure that we get it right with respect to the protocol. We know that scheduling the deposition schedules certain things and we've been working point by point with the NYPD to try to get the protocol to work just as we need it to for these depositions.

And with regard to Gerard Dowling, he's a good example, although he's already been prepped because he's been deposed before, he is now, he's again in his fact witness, has his fat witness hat on for his next deposition. Unfortunately, he has an open CCRB which a number of officers have and a number of high ranking officers have which means that his union counsel has to be involved or may have to be involved in the prep and at the deposition. So it's just, they're just extra layers of complication with respect to the high ranking officers and that's, that's the only reason why we've needed a little more lead time with them.

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1 THE COURT: Okay. So just to address the  
2 unaddressed issue I think that Ms. Frick raised, in  
3 terms of extra numbers in a particular month, I think  
4 that's what I had reserved March for, which is things  
5 that are unexpected and that then have to be moved to  
6 a little bit later. So, you know, certainly the  
7 parties are free to agree to an additional number, I  
8 think I'm prepared to order it at this time since we  
9 have March as a residual month.

11 Okay, so that's the numbers, now the question  
12 is, you know, and that my goal in ordering the chart  
13 was to allow for some mechanism to make sure that the  
14 schedule is being complied with. I think the chart's  
15 good, whether, you know, my thought in including the  
16 third column of what dates they're available just as  
17 an aid to parties to allow the plaintiffs to say,  
18 well, we've got these three dates and to quickly talk  
19 among themselves about what dates are going to be best  
20 for them and how to put it together.

21 I don't feel strongly about column three, I  
22 feel strongly about the numbers I just ordered, and  
23 everything else is an aid to try to get there. So  
24 maybe knowing that the numbers have now been ordered,  
25 maybe the plaintiffs want to talk about what, you

1 know, there are other ways to do this, I could say the  
2 20 depositions have to be scheduled by, you know, one  
3 week before the start of the month. There are kind of  
4 other ways to achieve this to make sure that things  
5 aren't flipping because I can order, yes, 20  
6 depositions in August and then if they don't get  
7 scheduled there may be some argument about whose fault  
8 that was and I don't have a good solution to this. So,  
9 Ms. Frick, you know, I'll hear from each side as to  
10 what the best solution is to make sure that the 20 is  
11 being complied with and that there's clear lines of  
12 responsibility for who it was that failed to put  
13 together the 20.

15 MS. FRICK: Yes, Your Honor, we certainly  
16 would ask that the 20 be scheduled at some period of  
17 time before the start of the month. I think ideally it  
18 would be two weeks before the start of the month so  
19 that you have a (inaudible) lead time for that first  
20 week of depositions, so I think that's what we would  
21 prefer. If the Judge, if Your Honor recalls we had a  
22 similar process at the beginning of this case a year  
23 ago for scheduling depositions and I think at this  
24 point that's the only mechanism that will actually  
25 work to get these on the calendar.



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You know, I understand the idea of the chart was to help facilitate that. What I'm confused about with the chart is that it shows the defendants have made contact with a number of witnesses and yet none of those witnesses have a deposition date proposed or scheduled, so I don't, I don't understand exactly how defendants are using the chart. I do think that if we get an agreement or an order that all of the depositions need to be scheduled in advance of the month, I think that that then, that really only counts for August and September because we already have an order that all depositions have to be calendared by September 16<sup>th</sup>. And that was docket number 630.

THE COURT: Right. Yes, I guess there really is just (inaudible) period. When, when -- when does the City think it can, let's just work on August for right now because I think it's an important month, when is the City going to provide -- let me back up for a second.

Is the availability of plaintiffs' counsel an issue? I certainly, you know, I guess there are some officers, low level officers that apply to certain cases more than others, but is availability of plaintiffs' counsel an issue for scheduling? In other words, if the City says here's our schedule for August

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2 and has on each date, you know, a list of names which  
3 may include plaintiffs -- well let me back up. Let's  
4 leave the plaintiffs out of this, plaintiffs'  
5 depositions out of this. If they get a schedule in  
6 August with a number of defendants, is there a  
7 possibility that the plaintiffs are going to say, you know  
8 what, we're not available that day to do that particular  
9 person, you know, that person needs to be moved to another  
10 date and you need to put someone else in on the 14<sup>th</sup>?

11 MS. FRICK: Your Honor, you're asking about  
12 plaintiffs' counsels' availability --

13 THE COURT: Exactly.

14 MS. FRICK: Okay. So, look, counsel has been  
15 coordinating in advance and we have, for the high  
16 level depositions we have already tried to kind of  
17 allocate a lead team for most, if not all, although of  
18 course once a deposition is scheduled we need to  
19 coordinate with each other so that all the questions  
20 (inaudible) asked, asked without having to duplicate  
21 efforts or duplicate questions (inaudible). So there's  
22 a lot of coordination going on and we've already tried  
23 to begin.

24 So while I want to say, of course, we will,  
25 and it is true that we will bend over backwards to

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make a schedule work that defendants send, there are depositions that are going ahead by certain plaintiffs' teams and if those teams are not available, you know, there's only so much reshuffling we can do if it's not sufficiently scheduled ahead of time. And our thinking was our provided chart that we provided as Exhibit C to our, our letter motion, fills out all of August, it's a mix of low level and high level, you know, more low level than high level, okay, and it's a variety of different teams taking the lead on each one as is indicated on the chart. And, you know, we already know that all of those dates work and we also tried to provide backup dates for almost all of those.

And so while I want to say that, you know, I would love to be able to say there's, you know, plaintiffs can, will never have a scheduling issue, that's just not the case, unfortunately, given that, you know, of course all of us have other cases as well. But that said, we are, we can, to insure that that is minimally, as minimally disruptive as possible and part of the way that we're doing that is trying to divvy up the work in advance and the other (inaudible) we're doing that is providing for the City a suggested list for August. And it's already now July 21<sup>st</sup> and so, you know, we've provided names that we know would work in August.

THE COURT: Well I mean I am agnostic as to the

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methodology, I just want the 20 scheduled. So the question I guess for the City is, you know, what is your plan, I want 20, you know I want the 20 scheduled in August, what's your plan for how you are going to offer those dates and when -- and when?

MS. ROBINSON: Just a second, Your Honor. Could we, I'm thinking could we give 10 in one week and then 10 in the following week?

THE COURT: Well how about 10 by -- how about 10 by a week from today and then 10 by the week after that, which leads slightly I guess into August, is that what you were proposing?

MS. ROBINSON: Yes.

THE COURT: Yes, well let's make it Wednesday, so 10 by the 27<sup>th</sup> and the remaining 10 by August 3<sup>rd</sup>. So I guess the problem is that if the plaintiffs have a problem with those dates, you know, you may have, you may have people, particularly low level people, who say, sure, I can do it any time the week of the 15<sup>th</sup> and you may put a schedule that picks up certain dates for that person but that might, that may be a problem for the plaintiffs. See, this is why I was hoping for the third column, just to make it easier for the plaintiffs. So I think what I need is on your

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good faith to not merely say here are the dates, but to also say here's the other availability in case any rejiggering is needed. So for any deponent for which there's other options, you need to say what those other options are in terms of dates, do you understand what I'm saying?

MS. ROBINSON: I do understand, and what we've done, what we did in the past was, except for the high ranking officers, we proposed dates on a certain day and then plaintiffs would get back to us on the next day with respect to whether those depositions could go forward. I don't know if that works in the current, in the current scheme but that's what we did, and then with the higher ranking 30(b)(6) essentially they're all scheduled, once we get their availabilities they're all scheduled at one time which we know goes into the September 16<sup>th</sup> deadline. But they're generally all scheduled at the same time and then we shoot the list over to plaintiffs and they have accepted, they accepted the schedule the last time.

MS. FRICK: My recollection, Your Honor, for the line level officers, the defendants provided, each week would provide a list of dates and I believe a backup date and I think that that's what the Court has indicated

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here would be useful is a date, backup date, or a date, an additional availability so that the plaintiffs have a little bit of flexibility.

You know, I'm a little concerned by getting a schedule on July 27<sup>th</sup> (inaudible) depositions presumably to begin August 1<sup>st</sup> or August 2<sup>nd</sup>, you know, that leaves very, very little lead time.

THE COURT: You're right, that doesn't give much lead time, yes, we're in this interim period so for the first two weeks in August which is August 1<sup>st</sup> through 12<sup>th</sup>, I think telling them two days, business days beforehand is not enough. So I mean, you know, Monday, the 25<sup>th</sup>, maybe is the better time for those first two weeks in August. And then for the last time --

MS. ROBINSON: Sorry.

THE COURT: Go ahead.

MS. ROBINSON: I was just going to say, Your Honor, that we have a little concern with August and September because many of the officers that were involved in the protests have to, mandatorily have to be present for the United Nations General Assembly and the US Open which both occur in August and September. So we just may need a little more flexibility with respect to August and September.

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2 THE COURT: Well flexibility with respect to  
3 what, to the number 20 or something else?

4 MS. ROBINSON: Maybe to the number 20 or, I'm  
5 just trying to explain why there would be some  
6 unavailable --

7 THE COURT: I need a better showing than that.  
8 I mean we have got 122 officers and, you know, if you  
9 tell me that 100 of them are on details and completely  
10 unavailable and you provide me proof of that, I might  
11 consider, reconsider the 20.

12 MS. ROBINSON: We do have outer borough  
13 officers that can take those slots, it's just a matter  
14 of getting their protocols together and also checking  
15 to see if they have open CCRBs, which involves the,  
16 also the calendar of the union counsel.

17 THE COURT: I understand that but, you know,  
18 if you need me to order something I'll order it if  
19 someone is being, you know, I'm sure there are  
20 multiple lawyers in these union counsel firms. I  
21 don't see why they should be holding up the  
22 depositions.

23 MS. ROBINSON: And I have no indication that  
24 they will be, I'm just saying --

25 THE COURT: I'm not moving, I'm not changing

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the 20 based upon what you've told me. So the only question is, you know, I want, and you're allowed to use plaintiff depositions to the extent that you need to but we have to have 20 for August and 20 for September.

So here's my interim proposal. So by July 25<sup>th</sup>, you give at least the 10 for August 1<sup>st</sup> to August 12<sup>th</sup> and then by August 1<sup>st</sup> you'll give us August 15<sup>th</sup> to August 26<sup>th</sup> -- I'm sorry, to August 31<sup>st</sup>. Now we have get through September and that will be it, and then give by, I'm sorry, did I say August -- July 25<sup>th</sup> you're giving August 1<sup>st</sup> to August 12<sup>th</sup>. August 1<sup>st</sup> you're giving August 15<sup>th</sup> to August 31<sup>st</sup>. By August 15<sup>th</sup> you'll give September 1<sup>st</sup> to 16<sup>th</sup>, by --

MS. FRICK: Your Honor, would it be --

THE COURT: Yes?

MS. FRICK: I very much apologize for interrupting, I'm just wondering if given the time if we could just have all of our dates, all 20 provided by the middle of August to give the plaintiffs some amount of lead time to --

THE COURT: Yes, I guess there's a point to that. All right, by August 15<sup>th</sup> you give September then. And then we'll get the full list on September



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16<sup>th</sup> to take us through the rest of the year.

MS. FRICK: I also do just want to highlight  
--

THE COURT: Go ahead.

MS. FRICK: It's my understanding that the  
Gray plaintiffs have a limited, if any, ability in  
August. They had, it's my understanding that they have  
reached out about scheduling these depositions in July  
and didn't hear anything. I know, I think that, you  
know, maybe one could go next week but I do know the  
Gray plaintiffs have availability problems for August,  
unfortunately.

THE COURT: All right. Well then let's not  
use the four Gray plaintiffs for filling in these  
slots. Okay, so July 25<sup>th</sup> we get the schedule, August  
1<sup>st</sup> to 12<sup>th</sup>, August 1<sup>st</sup> the schedule for August 15<sup>th</sup> to  
31<sup>st</sup>, and then August 15<sup>th</sup> for September, and then  
September 16<sup>th</sup> for everything else. I think, you know,  
I'm not going to order that third column (inaudible)  
right now because I think what I've ordered just now  
it supersedes that to some degree.

So I think, do we have what we need at this  
point, Ms. Frick, from your point of view, to make  
sure this happens?

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MS. FRICK: Yes, Your Honor, the only small thing I just want to note for the record, I don't think that this requires Court intervention at this point, but as I understand it there are a handful of 30(b)(6) topics that the City has not designated deponents for. So there is not a deponent for those topics on our chart. So the 122 figure only includes the people on the chart and because there hasn't been a, any designee named for that topic of topics, I'm not positive, I just want to note that that would be added. But this is something that we can meet and confer about.

THE COURT: Okay. Anything else from the plaintiffs' side for today?

MS. FRICK: No, Your Honor, thank you very much for your assistance.

THE COURT: Anything from the defendants' side that we need to do today?

MS. ROBINSON: No, Your Honor, just, I just wanted to mention that we have designated witnesses for each topic and provided those designations to plaintiffs, but if there is a gap with respect to some topics, I think that we can work that out.

THE COURT: Well they don't seem to think

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you've done it so I think the two of you should talk.

Anything else, Ms. Robinson?

MS. ROBINSON: No, Your Honor.

THE COURT: Okay, thank you, everyone, and  
good-bye.

(Whereupon the matter is adjourned.)

C E R T I F I C A T E

I, Carole Ludwig, certify that the foregoing transcript of proceedings in the United States District Court, Southern District of New York, In Re: New York Policing During Summer 2020 Demonstrations, docket #20cv8924, was prepared using PC-based transcription software and is a true and accurate record of the proceedings.

Signature Carole Ludwig

Date: July 26, 2022